

Robocall Mitigation Plan

This Robocall Mitigation Plan (“RMP”) is submitted by **Nextalk INC** for inclusion in the FCC Robocall Mitigation Database pursuant to 47 CFR § 64.6300–64.6305.

Nextalk INC is a U.S.-based telecommunications service provider operating as a wholesale carrier-to-carrier voice provider. The company does not operate as a foreign service provider and does not provide services POE (*Point of Entry*). Nextalk INC facilitates the exchange of wholesale domestic U.S. and international voice traffic exclusively between licensed telecommunications carriers and FCC 499 filers. The company does not originate robocall campaigns, autodialed traffic, or retail outbound traffic, and operates strictly within a wholesale interconnection framework.

Traffic Origination Profile

Nextalk INC carries wholesale voice traffic only, sourced from:

- Authorized U.S. telecommunications carriers
- FCC-registered service providers (499 filers)
- Verified international carrier partners
- Traffic transmitted includes legitimate carrier-to-carrier voice communications.

The company:

- ✗ Does NOT originate robocalls
- ✗ Does NOT serve retail traffic from POEs
- ✗ Does NOT provide direct end-user services who are not US clients

All customers and partners are subject to strict KYC (*Know Your Customer*) and KYUP (*Know Your Upstream Provider*) validation.

Gateway and Upstream Provider Compliance

Nextalk INC operates as a non-originating wholesale service provider and may handle both domestic and international traffic. The company ensures that:

All upstream providers are verified and contractually compliant
Partners are listed in the FCC Robocall Mitigation Database (where applicable)
Traffic is accepted only from trusted and vetted sources.

I. Advanced Network Monitoring

Nextalk INC maintains advanced monitoring systems to detect and mitigate suspicious traffic patterns.

Monitoring includes:

- Real-time traffic analytics
- Detection of invalid or spoofed Caller ID
- Identification of abnormal call patterns (short duration, high burst traffic)
- Automated blocking and alerting mechanisms
- Suspicious traffic is immediately flagged and investigated.

II. Existing Robocall Mitigation Measures

Service Limitations: Nextalk INC strictly prohibits:

- Outbound-only call center traffic
- High-risk traffic profiles
- Any form of illegal robocalling
- Only balanced, compliant wholesale traffic is allowed.

Caller ID Authentication and Restrictions: Customers may present only authorized and verified numbers

- Ownership and usage rights are validated before activation

Do-Not-Originate (DNO) Protection: The company blocks traffic involving:

- FCC DNO-listed numbers
- Government and emergency numbers
- Unallocated or invalid number ranges

Know Your Customer (KYC) Controls: Nextalk INC implements strict onboarding controls aligned with FCC expectations

Customers must provide:

- Business registration verification
- FCC 499 Filer status (where applicable)
- Service use declaration
- Website/domain validation
- Identity and ownership documentation

Upstream providers must provide:

- Robocall mitigation certifications
- Compliance assurances
- Valid business credentials

Verification and Agreements: All customers must sign agreements confirming:

- Compliance with robocall mitigation rules
- Lawful usage of telecom services
- Responsibility for downstream traffic

Traceback Cooperation

Nextalk INC fully cooperates with traceback efforts, including those initiated by the USTelecom Industry Traceback Group (ITG). The company commits to:

- Respond within 24 hours (commercially reasonable)
- Provide CDRs and routing data
- Investigate and take corrective action
- Suspend or terminate non-compliant customers

Records are retained for a minimum of two (2) years.

III. STIR/SHAKEN Implementation Status

Nextalk INC operates as a non-originating wholesale provider.

- The company does not directly originate end-user calls.
- STIR/SHAKEN attestation is applied by originating carriers.

For traffic where STIR/SHAKEN is not applicable:

- Analytics-based mitigation is applied
- Caller ID validation is enforced
- Suspicious traffic is blocked

IV. Ongoing Monitoring and Improvements

Nextalk INC continuously enhances its mitigation program through:

- Traffic analytics improvements
- Updates to blocking databases
- Customer and partner audits
- Alignment with industry best practices

V. Regulatory Compliance and Updates

Nextalk INC complies with all applicable FCC robocall mitigation requirements and commits to:

- Maintaining accurate RMD filings
- Updating the plan within 10 business days of material changes